

**BellSouth Telecommunications, Inc.** 

601 W. Chestnut Street Room 407 Louisville, KY 40203

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Dorothy J. Chambers General Counsel/Kentucky

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January 21, 2005

Ms. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

JAN 2 4 2005

PUSLIC STRVICE COMMISSION

Re:

Cumberland Cellular Partnership Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky PSC 2005-00020

Dear Ms. O'Donnell:

Enclosed for filing in the above-captioned case are the original and ten (10) copies of BellSouth Telecommunications, Inc.'s Motion for Full Intervention.

Very truly yours,

Dorothy J. Chambers

**Enclosures** 

cc: Parties of Record

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## COMMONWEALTH OF KENTUCKY

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#### BEFORE THE PUBLIC SERVICE COMMISSION

JAN 2 4 2005

PUBLIC SERVICE

COMMISSION

In the Matter of:

CUMBERLAND CELLULAR PARTNERSHIP	)	
PETITION FOR DESIGNATION AS AN	)	)
ELIGIBLE TELECOMMUNICATIONS CARRIER	) Case No. 2005-0002	0
IN THE COMMONWEALTH OF KENTUCKY	)	

# MOTION FOR FULL INTERVENTION

BellSouth Telecommunications, Inc. ("BellSouth"), by counsel, hereby moves the Public Service Commission of the Commonwealth of Kentucky (the "Commission"), to grant BellSouth full intervention in the above-captioned matter, pursuant to 807 KAR 5:001, Section 8.

In support of its motion, BellSouth states that it has an interest in this matter in that it is an incumbent local exchange carrier that provides service in the area that Cumberland Cellular Partnership ("Cumberland Cellular") serves. Therefore, it is appropriate that BellSouth be made a party to the case and that it be served with all testimony, pleadings, correspondence and all other documents submitted by parties.

For the foregoing reasons, BellSouth respectfully requests that the Kentucky Public Service Commission grant BellSouth's Motion for Full Intervention in this case.

Respectfully submitted,

DOROTHY J. CHAMBERS

General Counsel – Kentucky

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# **CERTIFICATE OF SERVICE**

It is hereby certified that a true and correct copy of the foregoing was served on the individuals on the attached service list by mailing a copy thereof, this 21st day of January, 2005.

Dorothy J. Chambers

## KPSC 2005-00020 - SERVICE LIST

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